

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
MPA WITNESS HAY
(USPS/MPA-T4-1-7)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to MPA witness Hay: USPS/MPA-T4-1-7.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993 Fax -5402
June 19, 2000

USPS/MPA-T4-1. Please provide a complete listing of all publications that you have authored or co-authored.

USPS/MPA-T4-2. Please fully describe your experience in observing and analyzing the operations of the United States Postal Service. In particular, describe your experience in observing and analyzing city carrier delivery operations. In your description, include all pertinent time periods, specific operations, facilities, Postal Service personnel with whom you had contact, and geographic locations.

USPS/MPA-T4-3. Please fully describe your involvement, if any, with witness Raymond's Engineered Standards Study. In your response, indicate the time period in which you first examined the methods employed in that Study, as well as the work-sampling data collected in that study. In addition, please describe all sources of your knowledge regarding that Study.

USPS/MPA-T4-4. When did you first become involved in the Data Quality Study mentioned at page 3 of your testimony?


USPS/MPA-T4-5. Please provide copies of all contracts, agreements (including confidentiality and non-disclosure agreements), task orders, job descriptions, work proposals or other documents relating to your duties on the Data Quality Study.

USPS/MPA-T4-6. Please provide all memos, notes or other documentation created by you or others in the course of your work on the Data Quality Study that relate to the potential uses of work sampling data collected during the Engineered Standards Study.

USPS/MPA-T4-7. At page three of your testimony, you state that you met often with the authors of the Data Quality Study and "discussed the various data quality issues at length." Please provide the dates of all such meetings during which the work sampling data collected by witness Raymond was discussed, and for each such meeting, provide all notes or other documentation pertaining to that discussion. For each such meeting, also list the attendees of the meeting.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Richard T. Cooper

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